

WELCOME TO THE ATLANTA VA HEALTH CARE SYSTEM

This presentation will provide you with the Atlanta VA Health Care System policies and step-by-step procedures for conducting human subject's research.

The Atlanta VA Human Research Protection Program has the infrastructure for conducting research that ensures consistency in quality and performance which is in accordance with federal regulations and institutional policies.



U.S. Department of Veterans Affairs
Atlanta VA Health Care System

ATLANTA VA RESEARCH WEB SITES

Foundation for Atlanta Veterans Education and Research, Inc
<https://faver.foundation.org>

Research Credentialing and Training
https://www.atlanta.va.gov/services/research/Research_Credentialing.asp

Conducting Human Research
http://www.atlanta.va.gov/services/research/Conducting_Human_Research.asp

AVAHCS Website
<http://www.atlanta.va.gov/ATLANTA/services/research/about.asp>

Investigators Forms and Policies
<http://www.atlanta.va.gov/services/research/investigators.asp>

Data Analytics Core
https://www.atlanta.va.gov/services/research/Data_Analytics_Core.asp

**Research Staff Must be Knowledgeable about the
Guidance Documents, Tools, Policies, and Procedures
Located on the AVAHCS Research Websites**

GOVERNMENT AGENCIES



Emory IRB Web Page www.irb.emory.edu



National Institute of Health (NIH)
www.nih.gov



Office of Research Oversight (ORO)
www.va.gov/oro/



Food and Drug Administration (FDA)
www.fda.gov



Collaborative IRB Training Initiative (CITI)
www.citiprogram.org



Office of Human Research Protection (OHRP)
www.hhs.gov/ohrp/



45 CFR 50 Protection of Human Subjects:
www.gpoaccess.gov/cfr/index.htm

PROFESSIONAL ORGANIZATIONS



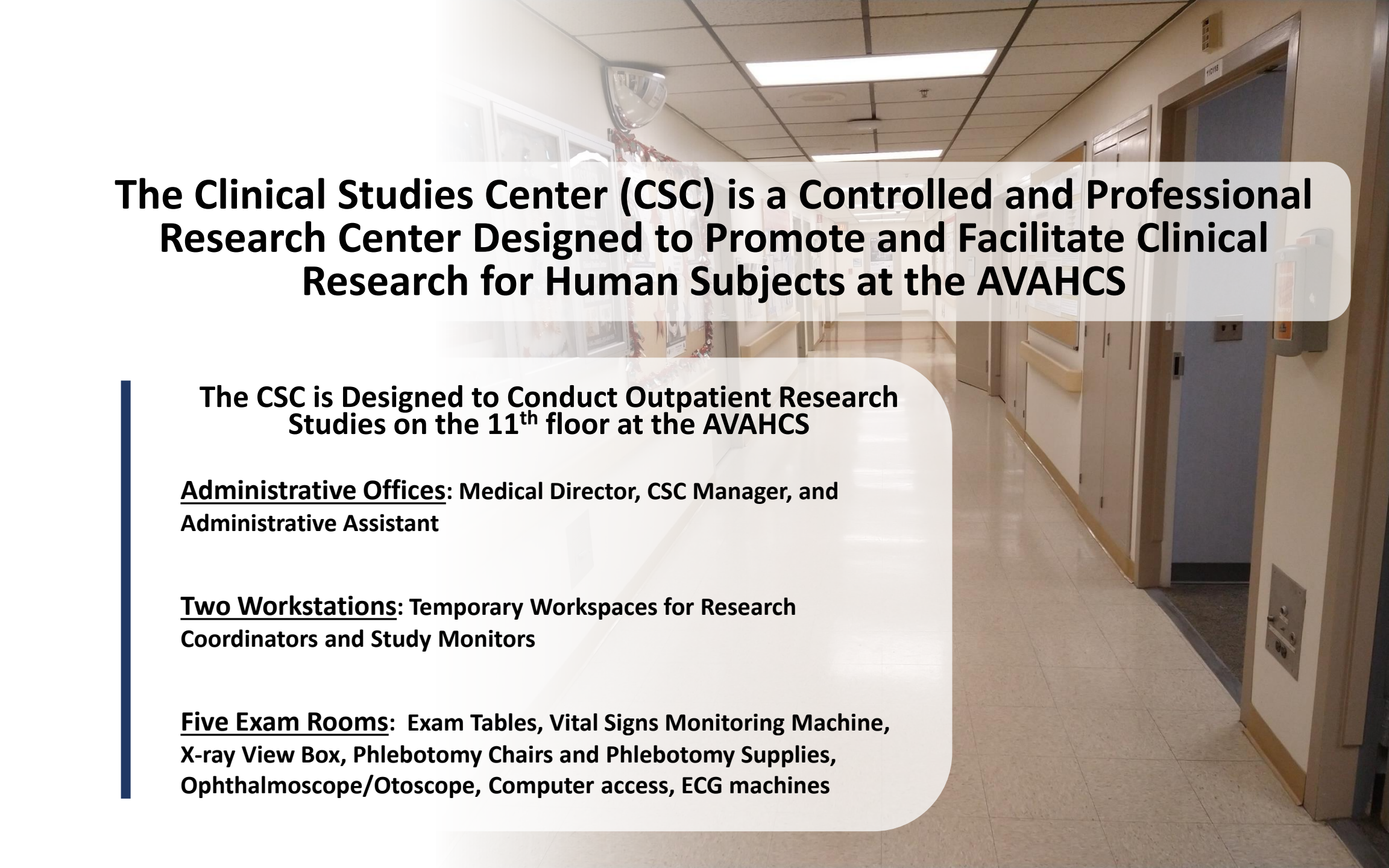
**Society of Clinical Research Associates
(SOCRA)** www.socra.org



**Association of Clinical Research
Professionals (ACRP)** www.acrpnet.org



**Public Responsibilities in Medicine and
Research (PRIM&R)** www.primr.org



The Clinical Studies Center (CSC) is a Controlled and Professional Research Center Designed to Promote and Facilitate Clinical Research for Human Subjects at the AVAHCS

The CSC is Designed to Conduct Outpatient Research Studies on the 11th floor at the AVAHCS

Administrative Offices: Medical Director, CSC Manager, and Administrative Assistant

Two Workstations: Temporary Workspaces for Research Coordinators and Study Monitors

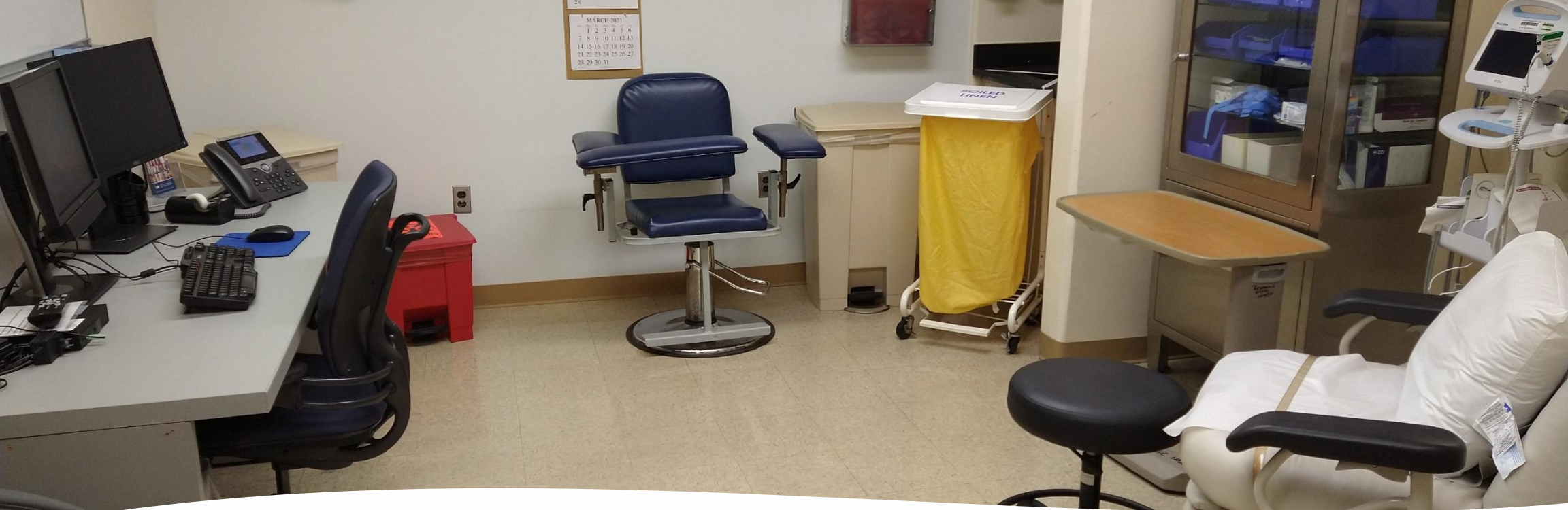
Five Exam Rooms: Exam Tables, Vital Signs Monitoring Machine, X-ray View Box, Phlebotomy Chairs and Phlebotomy Supplies, Ophthalmoscope/Otoscope, Computer access, ECG machines

CSC LABORATORY

Prepare
Research
Specimens
for
Shipping
or Storage

- Bio-Safety Cabinet
- -80°C Freezer
- Refrigerator
- Centrifuge
- Refrigerated Centrifuge
- Weekly Dry Ice Delivery





**To Reserve an Exam or Interview Room at the CSC, submit a request through the
[CSC Rooms Request Form](#)**

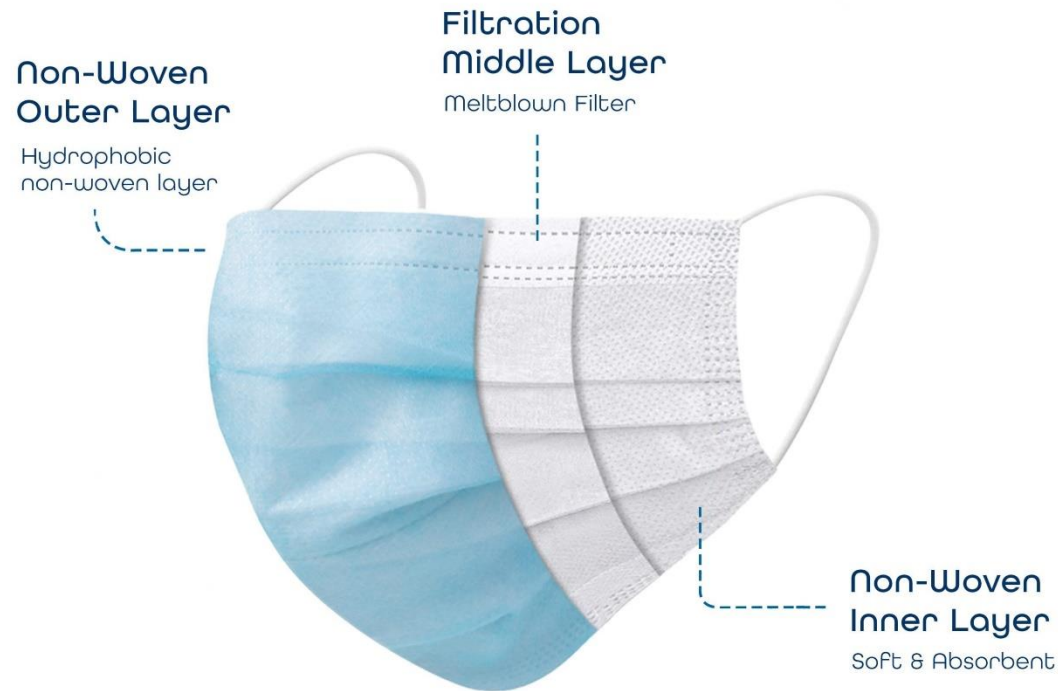
**Study Staff are Responsible for Greeting Participants in a Timely Manner and Notifying the CSC
of Appointment Cancellations**



A woman with dark curly hair, wearing a light blue surgical face mask and a black and white striped shirt, is seated on a bus. She is looking out the window. The bus interior features yellow handrails. The background is blurred, showing other passengers and the bus structure. There are several yellow diagonal lines in the upper right corner of the image.

[1] WEAR A FACE MASK

3-Layer Filtration



[viewPDF.cfm \(va.gov\)](https://www.va.gov/viewPDF.cfm)



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Principal Investigator Oversight

VA



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Delegation of Responsibilities to Qualified Staff

GCP 4.2.3, GCP 4.1.5



Medical Oversight of Study Subjects

GCP 4.3.14, GCP 4.3.2



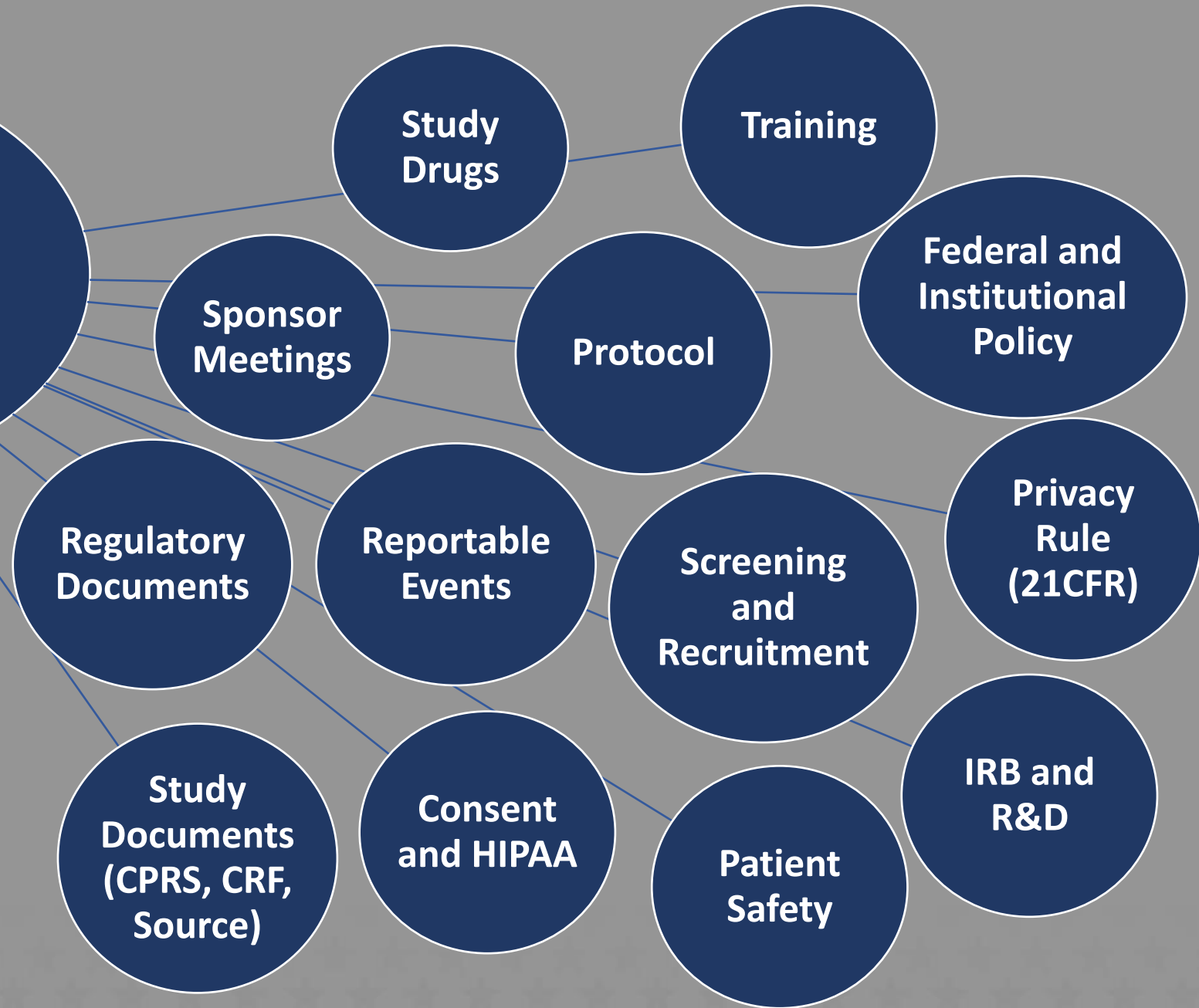
Delegation of Responsibilities to Adequately Trained Staff

GCP 4.2.4, ICH GCP Aden 4.2.6



Adequate Supervision and Involvement

21CFR 312.30, GCP 4.2.2, FDA Guidance Document



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Staff Credentialing & Training Requirements



In order to be engaged in research at the AVAHCS, Investigator and Co-Investigators must either have a VA appointment or without compensation appointment (WOC).



All MDs, RNs, LPNs, LCSWs, and other licensed personnel must complete VetPro credentialing prior to engaging with research subjects.

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Additional Certification and Training



Phlebotomy Certification

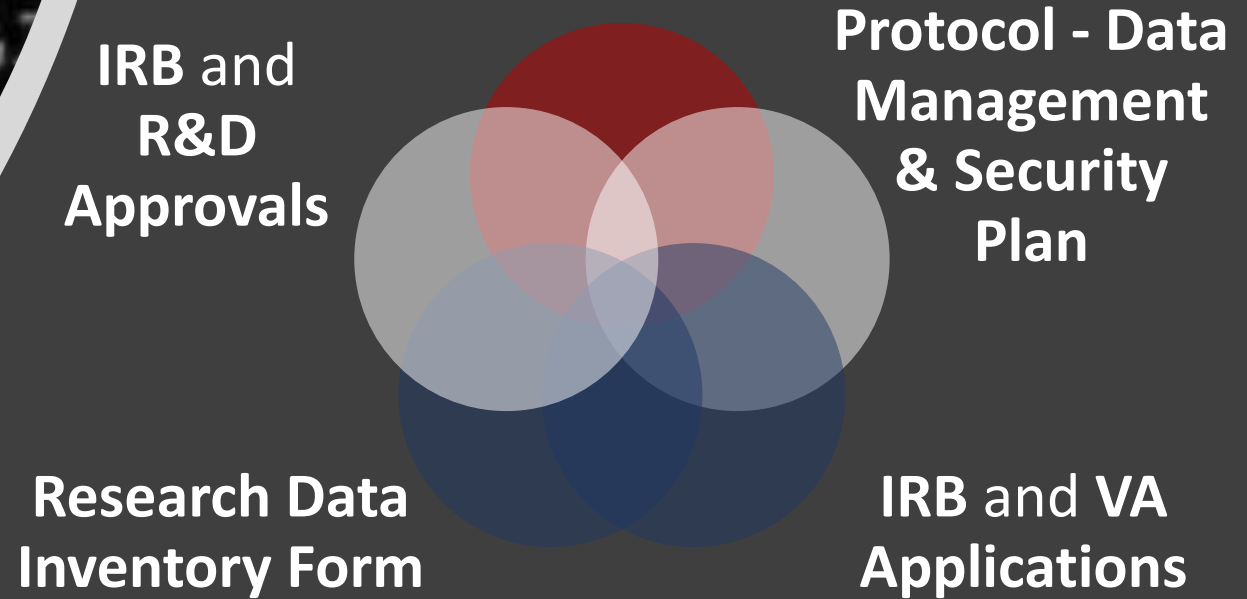


CSC Laboratory Access



Notify the CSC Manager if additional
Certification or Training is needed

Where are Your Research Data Stored and Transmitted?



These Documents Will Tell You if You are Permitted to Disclose Data and How



Data Management and Security

VA Research Data and Information Must be Saved on a Secured AVAHCS Research Server. Contact the Director of Research Operations for Access

**Secure Paper Study Files in a Locked Cabinet and a Locked Office at the VA.
Never Leave PHI Unattended**

All VA Sensitive Research Information Needs to be Stored within the VA Unless Approvals by Privacy and Information Systems Security Offices are Given

PHI and/or Identifying Information Should Not be Included in the CRFs Unless Special Authorization for a Limited Data Set Has Been Granted

Social Security Numbers Should Not be Recorded in the CRFs – Only Use a Study ID to Identify Study Participants



Data Outside the VA



Data Transfer Agreements and Data Use Agreements

Laptops and flash drives must be encrypted by the VA if used for transporting data outside the VA



Authority to Transport (AUT)

AUT is needed if physically transporting outside of the VA any of the following:

- Paper research files containing PHI and/or
- Specimen/samples that are labeled with code+date+other element of PHI

An AUT is not required if specimen contains only study ID and a date

New Study Approval Process

Safety Subcommittees and PO/ISSO
Pre-Review (IRBNet)

IRB Submission and Approval

VA R&DC (IRBNet) Submission and
Approval

ACOS/R
Letter

ENROLL

ACOS/R Letter

VA



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DEPARTMENT OF VETERANS AFFAIRS
Atlanta VA Health Care System R&DC
Atlanta VA Health Care System

Date: April 21, 2021

From: ACOS/R&D and R&D Committee

TO: April Maa, MD

Protocol Title: [1618546-1] Genetic Risk for AMD in Diverse Veteran Populations

Submission Type: New Project

Review Type: Full Committee Review

Action: Combined Associate Chief of Staff for Research and Development (ACOS/R&D) and R&D Committee Study Approval Notice

1. This research project was reviewed and found to be aligned with the mission of the VHA, scientifically valid, and reviewed by all appropriate subcommittees to ensure the safety of the study subjects and VHA staff. Approval is granted by **CONVENED BOARD REVIEW** of the Atlanta VA Health Care System Research and Development Committee.
2. This research project has obtained the following additional approvals:
 - a. VA Central Institutional Review Board Approval: PI/SC 08/08/2016 LSI 02/18/2021
3. The Privacy Officer reviewed this research project on 07/13/2016 and found that the proposed research complies with VA Privacy Requirements.
4. The Information Safety and Security Officer reviewed this research project on 07/19/2016 and found that the research project complies with information safety and security requirements for VA.
5. A waiver of HIPAA authorization was approved by the VA Central IRB on 08/08/2016.
6. You are responsible to your overseeing committee for any requests for information, continuing review (if required), or other project status updates. No changes may be made to your project without the permission of the reviewing subcommittee unless there is a circumstance where harm could come to a research subject. Immediate reporting to the responsible committee is then required.
7. If any of your personal or financial situations change that may reasonably put you in conflict with this study, you must submit a revised OGE 450 Alt to your local conflict of interest administrator.
8. Acknowledgment of the VA's contribution is required in any publications and presentations that may result from this research.
9. As all applicable approvals have been obtained, you may now begin your research project.

Charles M.
Hart 992390

Digitally signed by
Charles M. Hart 992390
Date: 2021.04.22
16:14:12 -0400

Associated Chief of Staff for Research and Development (ACOS/R&D)

A study can be closed when

- **Enrollment is closed and all subjects have completed study participation**
- **Data collection is completed. No additional PHI is being collected**
- **Collection of specimens has ceased**
- **The sponsor terminates the study and completes a study close out visit**
- **Data analysis of PHI is complete**

Retention Schedule January 2020 Chapter 8 – Office of Research and Development

Study Closeout and Record Storage

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Amendments and Continuing Reviews

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**ALL CHANGES TO THE
ORIGINALLY APPROVED STUDY
MUST BE REVIEWED BY THE IRB**

**Submit Staff Changes to eRRRP
Submit Staff Changes to eIRB for Emory Studies**

REQUIRED R&D APPROVAL

Risk/Benefit Ratio

Change in PI

**Amendment to a Data
Repository**



CONTINUING REVIEW

**Required by the IRB Based
on the Degree of Risk**



**Set an Outlook Reminder
30 Days Before Expiration**

Avoid Lapses

RECRUITMENT



These Policies Must be Followed
when Recruiting Potential
Research Subjects at the
AVAHCS

- Recruitment Policy
- In Person Recruitment Policy
- Recruitment Flyer Policy
- Recruitment policies for Non-VA research projects

CONTACTING POTENTIAL PARTICIPANTS

You May Make Initial Contact with Potential Subjects:

- In Person
- IRB Approved Recruitment Letter
- IRB Approved and Encrypted Email
- Through a Registry



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CONTACTING POTENTIAL PARTICIPANTS

Share the AVAHCS RCO phone number -
(404) 321-6111 ext. 206964

Participation is **VOLUNTARY**

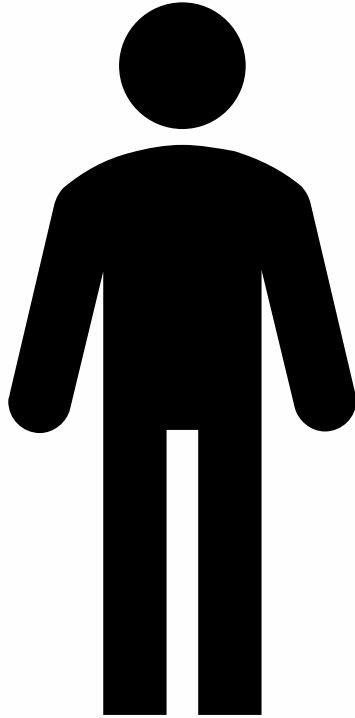
Safeguard Against Coercion

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RECRUITMENT LETTERS



Equal Opportunity to Opt-in or Opt-out

Keep It Confidential

Use Official VA Letterhead

Name the Referring Provider

**Contact Information for AVAHCS
Research Compliance Officer**



U.S. Department of Veterans Affairs
Atlanta VA Health Care System

Date: May 21, 2021

Joan R. Patient
29 High Glucose Street
Atlanta, GA 30033

Dear Ms. Patient,

I am writing to tell you about a voluntary research study being conducted at the Atlanta VA Healthcare System by Dr. Iam Expert in the Diabetes Unit. I am letting my patients with diabetes who are under 40 years old know about this research project, in case they would like to participate.

Dr. Expert is studying environmental causes and effects of diabetes. Diabetes may run in certain families, but many other things like diet and exercise can influence a person's risk of developing this disorder. This research project is designed to find out whether diabetes in some people can be linked to specific genes.

The researchers are looking for patients under 40 years old, with diabetes, who have a brother or sister who also has diabetes. Participation would involve two visits to the Clinical Studies Center at the Atlanta VA Medical Center, each lasting about half a day. There are no medications involved. Participation includes a dietary evaluation, questionnaires, a medical and family history, a physical exam by a study doctor and blood and urine tests.

You will not receive any personal health benefits because of your participation in this research study. We hope that the results will help us understand diabetes better, and will benefit patients with diabetes in the future. Your participation in this research study is voluntary. Whether you participate or not will have no effect on the medical care or benefits that you receive at the Atlanta VA Healthcare System.

If you would like more information about the study, please contact the study coordinator Jane Helper, RN, at (404) 321-6111-XXXXXX or Dr. Expert at (404) 321-XXXXXX. You may also return the attached letter and check the box to indicate if you do or do not want to participate in this research study. You may return the letter enclosed in the postage paid addressed letter provided. If we haven't heard from you in 2 weeks, someone from Dr. Expert's research team may phone you.

The Atlanta VA Research Compliance Officer (RCO):

If you have questions about your rights while taking part in this study, or you have concerns or suggestions and you want to talk to someone other than the researchers about the study, you may contact the Atlanta VA RCO at: (404) 321-6111 ext. 206964.

Thank you in advance for considering this request.

Sincerely,

Primary Care Physician, MD
(XXX) XXX-XXXX

Note: May also be a clinician or specialist well-known to patient but must not be a member of the research team.

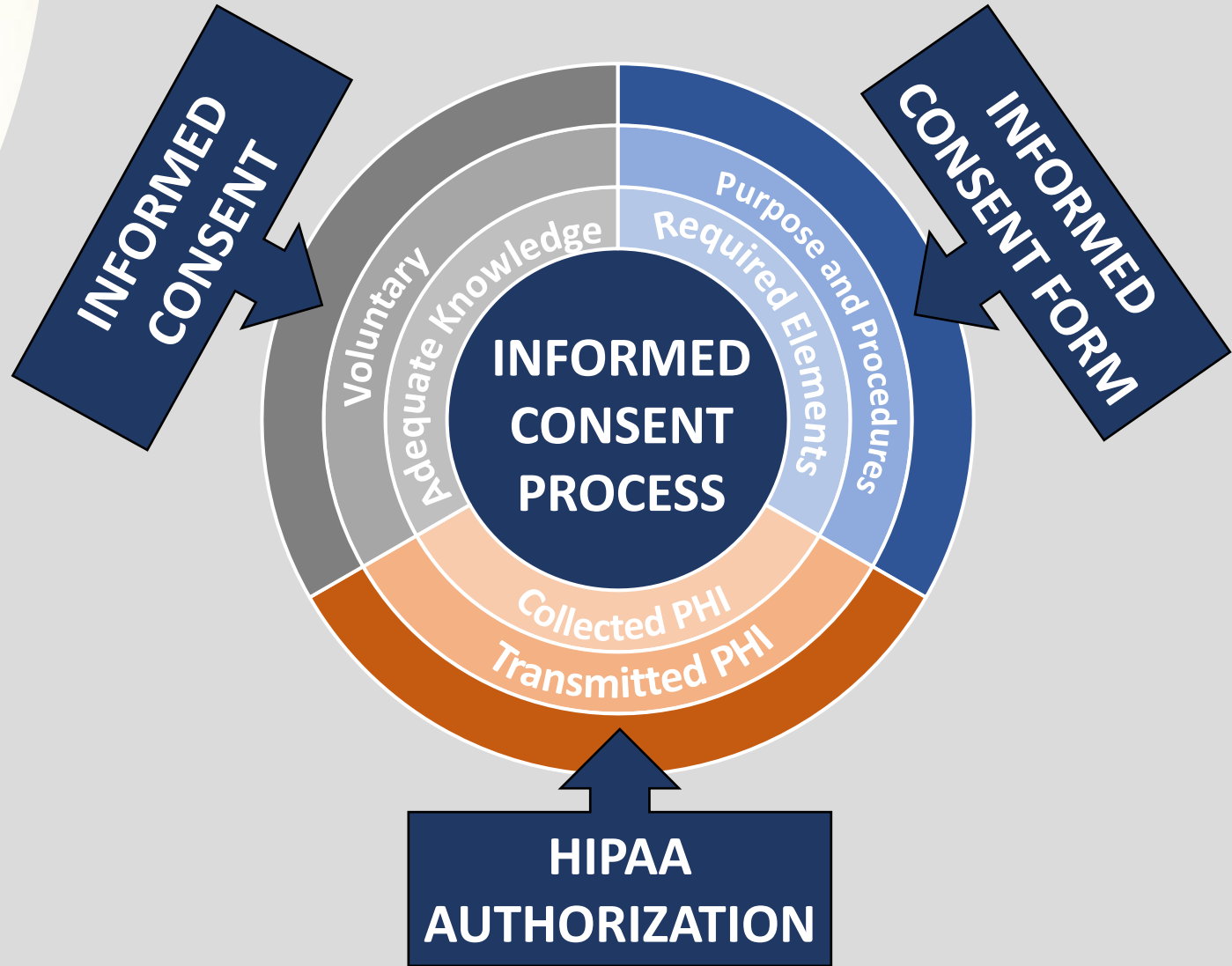
Iam A. Expert, MD
Diabetes Research Unit
(XXX) XXX-XXXX

Include enclosure(s) as applicable: Opt-in/Opt-Out Form, Recruitment materials, e.g. brochure, flyers, etc.

7/20/2018



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Consent

Best Practices

- Obtain Informed Consent and HIPAA **PRIOR to Initiating Any Study Activity**
- Use a Private Room
- Most Current, IRB Approved Versions of the ICF and HIPAA
- Discuss All Elements of the Consent
- Answer All Questions from the Subject
- Allow Subjects Sufficient Time for Review of ICF
- May Provide a Copy of the ICF to the Potential Study Participant Prior to a Scheduled Discussion (mail, email, in person)

The Informed Consent Process

[Submissions](#) [Meetings](#) [Reports](#) [Library](#) [Help Center](#)

Approved

Entered IRB: 6/5/2018 5:00 AM
Initial approval: 7/12/2018
Initial effective: 7/12/2018
Effective: 8/24/2020
Approval end: 6/9/2021
Last updated: 12/10/2020 5:54 PM

Next Steps

[View Study](#)

[Printer Version](#)

[Create Modification/CR](#)

[Report New Information](#)

[Add Participating Sites](#)

[Assign Primary Contact](#)

[Manage Guest List](#)

[Add Related Grant](#)

[Add Comment](#)

[View in Previous eIRB](#)

[View CITI Training](#)

IRB00104051: AEGIS-II (AVAMC)

Principal investigator: Kretlon Mavromatis
Submission type: Initial Study
Primary contact: Phyllis Mitchell
PI proxies: Phyllis Mitchell

IRB office: Emory IRB Office
IRB coordinator: Daniel Roysden
Regulatory authority: Pre-2018 Requirements

```
graph LR; A([Pre-Submission]) --> B([Pre-Review]); B --> C([IRB Review]); C --> D([Post-Review]); D --> E([Review Complete]); C -- "Clarification Requested" --> B; D -- "Modifications Required" --> A;
```

[History](#) [Funding](#) [Contacts](#) [Documents](#) [Sites](#) [Follow-on Submissions](#) [Reviews](#) [Snapshots](#)

Study Related Documents

Draft	Category	Final	Last Finalized	Document History
CSL112_3001 - Protocol Amendment - 1 - 10Sep2019.pdf	IRB Protocol			History
CSL112_3001 - Protocol Amendment - Amendment 1 Final Summary of Changes 10Sep19.pdf	IRB Protocol			History
Effective_USA (English) EQ-5D-3L Paper Telephone v1.0 (ID 23490).docx	Surveys, Questionnaires, Interview Guides	Effective_USA (English) EQ-5D-3L Paper Telephone v1.0 (ID 23490).pdf	5/7/2020 4:11 PM	History
apolipoprotein A-I - Investigator Brochure - Edition 12 - 10Jan2020.pdf	Drug Attachment	apolipoprotein A-I - Investigator Brochure - Edition 12 - 10Jan2020.pdf	4/9/2020 1:15 PM	History
2014-09_AlbuRx25-Prescribing-Information.pdf	Drug Attachment	2014-09_AlbuRx25-Prescribing-Information.pdf	3/20/2020 1:30 PM	History
AEGIS-II CSLBehring IND document_cvrltr signed.pdf	Drug Attachment	AEGIS-II CSLBehring IND document_cvrltr signed.pdf	3/20/2020 1:30 PM	History
COVID-19 Protocol Addendum.docx	IRB Protocol	COVID-19 Protocol Addendum.pdf	3/20/2020 1:29 PM	History

Site Related Documents

Draft	Category	Final	Last Finalized	Document History
CSL112_3001-8400655-VA Informed Consent PREGNANT PARTNER 6.5.18.doc	Consent Form	CSL112_3001-8400655-VA Informed Consent PREGNANT PARTNER 6.5.18.pdf	6/15/2020 3:16 PM	History
AEGISII_VA_HIPAA_Waiver.docx	Consent Form	AEGISII_VA_HIPAA_Waiver.docx	7/11/2020 9:42 PM	History
AEGISII Informed Consent v06.07.2019 clean	Consent Form	AEGISII Informed Consent v06.07.2019 clean	6/15/2020 3:16 PM	History
CSL112_3001-8400655-VA_HIPAA_Authorization_6.5.18.docx	Consent Form	CSL112_3001-8400655-VA_HIPAA_Authorization_6.5.18.pdf	6/15/2020 3:16 PM	History
2020-03-17_CSL112_3001_Site Communication_COVID19_Final.pdf	Other	2020-03-17_CSL112_3001_Site Communication_COVID19_Final.pdf	3/20/2020 1:29 PM	History

Must use Final version and not Draft

ICF Signature Page

- Subject (or LAR) Must Print Name, Sign, and Enter the Date. Study Staff are NOT permitted to complete any fields for the Subject
- Marks are acceptable in situations where the subject has difficulty signing
- The VA does not require a POC signature, but many sponsors require it

Standalone HIPAA – VA form 10-0493

- Staff Must complete the header on each page.
- All subjects or LAR must sign and date page 4
- Page 5 is Signed ONLY if applicable (when optional data or biological specimens are being placed in a repository).
- Do not complete or enter information on page 5 if it is not applicable. It may be removed if not being used.



HIPAA AUTHORIZATION

To whom the PHI is Disclosed

Description of Purpose for the Disclosure


Expiration Date for the Disclosure

Patient Rights to Revoke Authorization

Signature of Subject or Legal Representative

Authorization For Specimen or Data Repository





```
graph LR; A((Provide a Copy of ICF to the Subject)) --> B((Keep Original ICF and HIPAA with Investigator's Files)); B --> C((Document Consent in CPRS or Paper Chart));
```

**Provide a
Copy of ICF
to the
Subject**

**Keep Original
ICF and
HIPAA with
Investigator's
Files**

**Document
Consent in
CPRS or
Paper Chart**



If there is any question about a potential subject's decision-making capacity and there is no documentation in the medical record that the individual lacks decision-making capacity and the individual has not been ruled incompetent by a court of law, the investigator must consult with a qualified practitioner (can be on the research team) about the individual's decision-making capacity before consenting

Legally Authorized Representative (LAR)

- Individuals that may serve as LARs are (in this order):
 - Health Care Agent (Durable Power Of Attorney for healthcare)
 - Legal guardian
 - Next-of-kin (relative)
 - 18 years of age or older in the following order 1- spouse, 2- child, 3- parent, 4- sibling, 5- grandparent, 6- grandchild
 - Close friend

A Personal Representative may sign the HIPAA on behalf of a subject

- The subject's Health Care Power of Attorney (POA)
- Court Appointed Legal Guardian

LARs May be Qualified to Sign ICF but Are **Not Always Qualified to Sign the HIPAA**



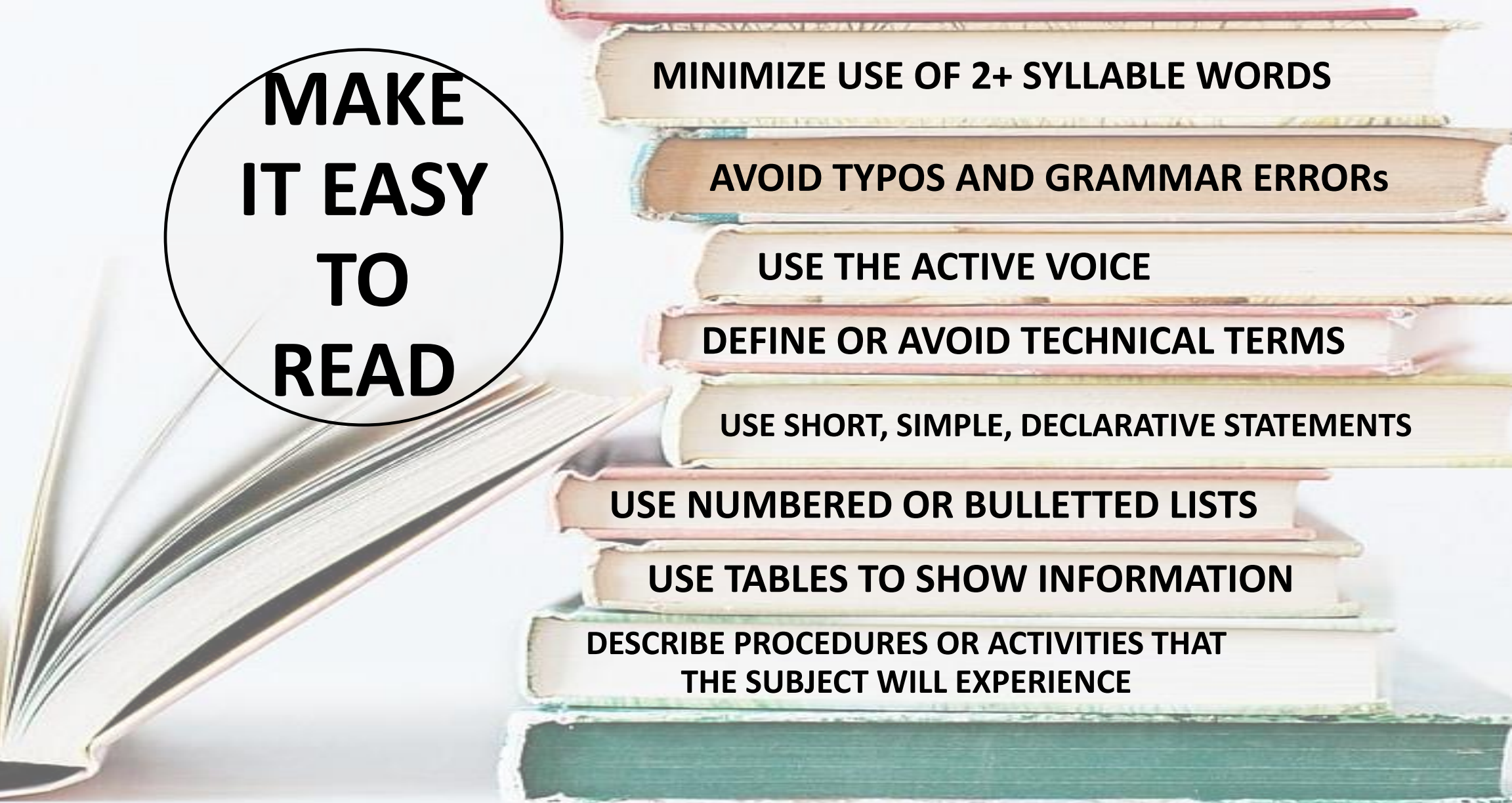
Consent Form Templates

- VA Informed Consent Form template – pre-2018 Common Rule
- VA Informed Consent Form & HIPAA template *combined* – 2018 Common Rule
 - Study must not include optional tissue/data banking or use of LAR
- VA Informed Consent Form *Standalone* – 2018 Common Rule
 - For studies that include optional tissue/data banking or use of LAR
- VA Form 10-0493 *Standalone* HIPAA
 - Must be used if using a standalone ICF

National Cancer Institute Template for Oncology Studies

CIRB Template for VA CIRB Studies





MAKE IT EASY TO READ

MINIMIZE USE OF 2+ SYLLABLE WORDS

AVOID TYPOS AND GRAMMAR ERRORs

USE THE ACTIVE VOICE

DEFINE OR AVOID TECHNICAL TERMS

USE SHORT, SIMPLE, DECLARATIVE STATEMENTS

USE NUMBERED OR BULLETED LISTS

USE TABLES TO SHOW INFORMATION

**DESCRIBE PROCEDURES OR ACTIVITIES THAT
THE SUBJECT WILL EXPERIENCE**



NOTICE OF PRIVACY PRACTICE

**Required for Any Non-
Veteran Enrolling in a
AVAHCS Study**



**Review the NOPP Policy
on the Conducting
Human Research Website**



HIPAA Waivers & Alterations



Privacy Rule Allows the Use and Disclosure of PHI Without a Patient's Authorization

**Solely in
Preparation
of Research**

**IRB
Approved**

**PHI is
Necessary
to Conduct
the
Research**



HIPAA Alteration Worksheet

Required at initial submission

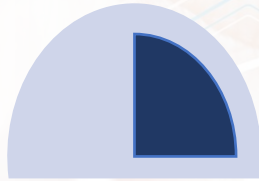
- The use or disclosure of PHI involves no more than a minimal risk to the privacy of



HIPAA WAIVERS

Research activities are not considered to be part of normal healthcare operations and therefore a HIPAA waiver and/or signed HIPAA authorization is required

Partial Wavers



A partial HIPAA waiver permits the use of PHI for recruitment purposes only, to allow identification and, as appropriate, contact of potential participants to determine their interest in study participation

Full Waivers



A complete HIPAA waiver allows an investigator to use and disclose PHI for a particular research trial or activity without obtaining written authorization from the participants

List of PHI (Protected Health Information)



Names

Dates



Addresses / Zip Codes /
Geocodes

Phone Numbers



Fax Numbers

Email Addresses



Social Security
Numbers



Device
Identifiers

Vehicle Identifiers



www

URLs

IP Addresses



Biometric Identifiers

Facial Images



Any Other Unique
Identifiers



Medical Record
Numbers



Health Plan
Beneficiary Numbers



Account Numbers



Certificate /License
Numbers

AB-12 34



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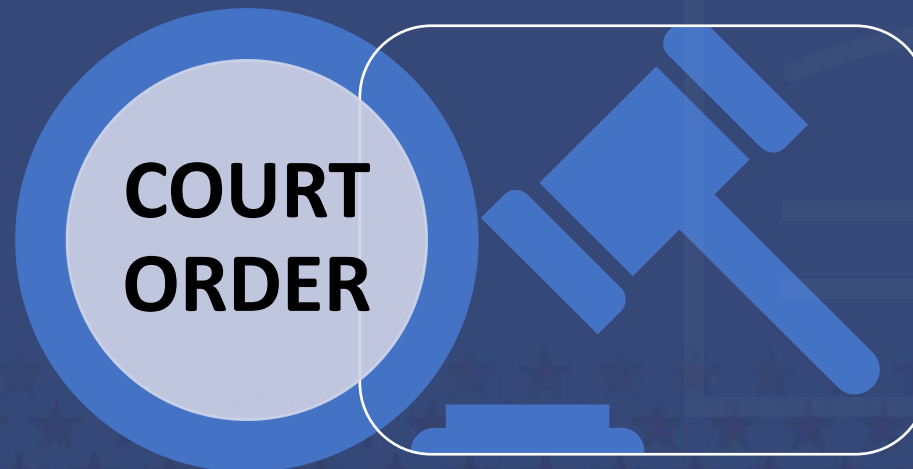
Atlanta VA Health Care System



SUBPOENA

CERTIFICATE OF CONFIDENTIALITY

PROTECTION AGAINST COMPULSORY LEGAL DEMANDS FOR PHI



**COURT
ORDER**

RESEARCH COMPLIANCE OFFICE

HIPAA AUTHORIZATION

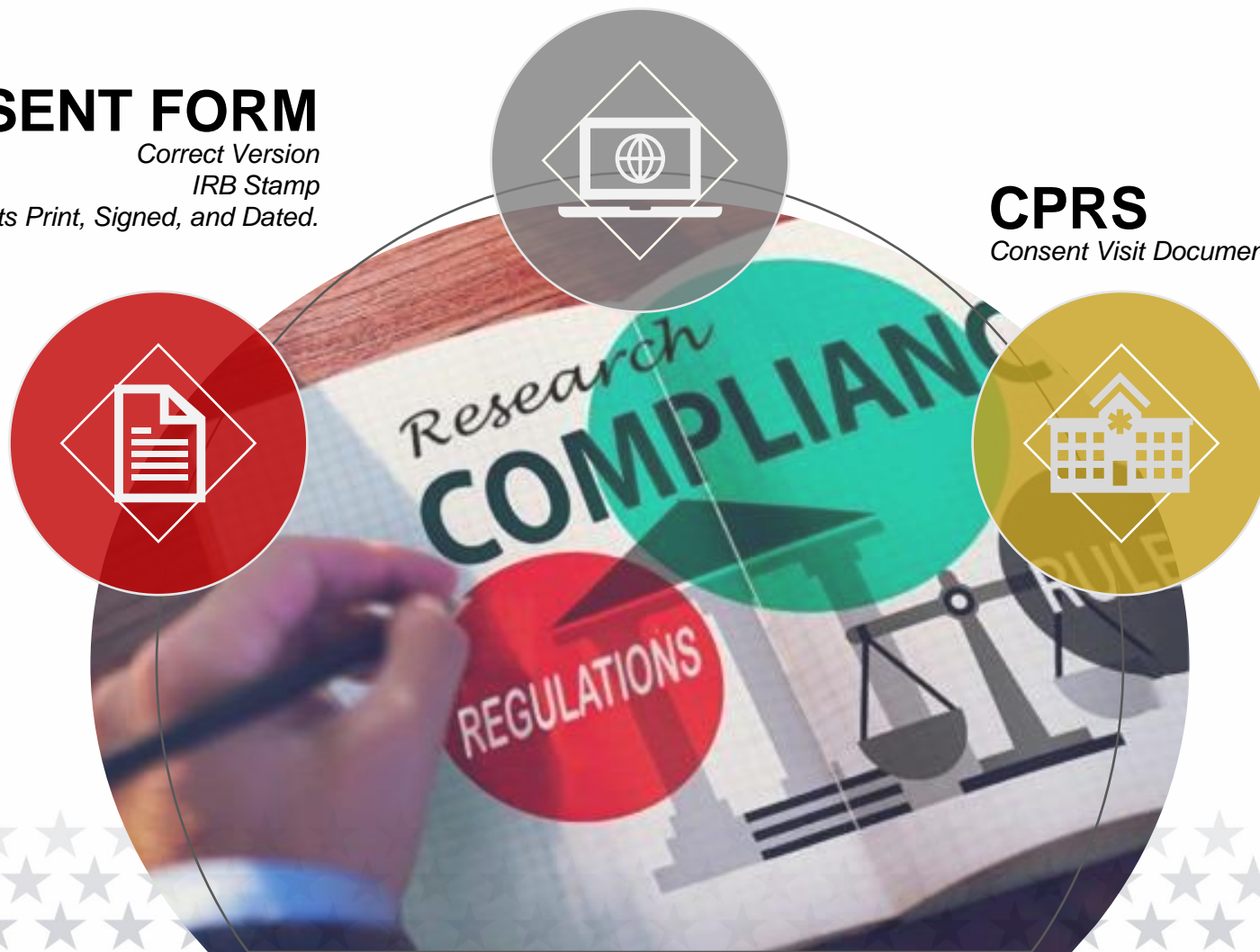
*Correct Version
Signed and Dated*

CONSENT FORM

*Correct Version
IRB Stamp
Subjects Print, Signed, and Dated.*

CPRS

Consent Visit Documentation



U.S. Department of Veterans Affairs

Atlanta VA Health Care System

MONITORING AND SPONSOR VISITS



✓ All Monitors Check in at CSC

✓ Restricted Access to PHI

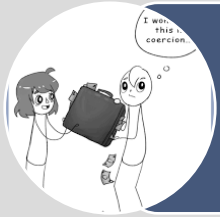


✓ CPRS Driver Method

✓ Immediately Report Non-Compliance



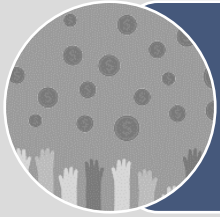
Research Subject Reimbursement



Undue Pressure or Coercion



Consenting



Reimbursement Procedures Depend on Where the Funds are Managed (VA, Emory, FAVER)



Maintain Clear Documentation of All Subject Reimbursement

REGULATORY DOCUMENTATION

Protocol and any
amended protocols

IRB & R&D approval
documentation

Copies of the eIRB
initial submission

Copies of the eRRRP
submission

Approval letter from
ACOS for Research

Approved Informed
Consent Form and
HIPAA Documents

Modifications forms
with supporting
documents

Continuing review
approval
documentation

Reportable Events
(SAEs, UPs, SPs, RIs)

Recruitment
materials

IRB, R&D, and
Sponsor's
Correspondence

Protocol Termination
form

Investigator's
Brochure

Final signed 1572 and
amended FDA 1572s

Principal
Investigator's CV

Copy of
randomization codes

Investigational article
log and copies of
drug/device
shipment/retrieval

Lab Certification

Accounting of
Disclosure Form

Enrollment log

Monitoring visits
reports

Research Training
Certification

Signature and
Delegated
Responsibilities Log

Abstracts or
manuscripts with
study results

VA



U.S. Department of Veterans Affairs
Atlanta VA Health Care System

Documentation Source Documents



Documentation Source Documents

Patient is taking <sup>ECC
3/30/21</sup> insulin metformin

<sup>ECC
3/2/21</sup>
~~6/30/2020~~ 6/30/2021

CPRS NOTES

Location for Current Activities

Select the appointment or visit that should be associated with the note or orders .

OK

Cancel

Encounter Location

ATL RESEARCH-STUDY Apr 07,17 13:01

Clinic Appointments Hospital Admissions New Visit

Visit Location

ATL RESEARCH-STUDY

ATL RESIDENTIAL CARE

ATL RHEUM TELE MED MONITORIN

ATL RHEUM-E-CONSULT-PHARM-X

ATL RHEUMATOLOGY CLINIC A

ATL RHEUMATOLOGY CLINIC B

ATL RHEUMATOLOGY-CONTINUITY

Date/Time of Visit

NOW

☒ Historical Visit: a visit that occurred at some time in the past or at some other location (possibly non-VA) but is not used for workload credit.

Visit Location

- **ALWAYS** select “ATL Research-Study or other ATL Research-Clinic

Historical Visit

- **ALWAYS** select Historical Visit

VA

Progress Note Title:

RESEARCH <CONSENT-RESEARCH IMED>

OK

Cancel

RESEARCH <RESEARCH TELEPHONE NOTE>

RESEARCH CONSENT PROGRESS NOTE

RESEARCH PROGRESS NOTE

RESEARCH TELEPHONE NOTE

RESIDENT <COMMUNITY CARE-CONSULT RESULT MH SATP RESIDENT

RESIDENT <DENTAL ORAL SURGERY RESIDENT INPT PROGRESS NOTI

Date/Time of Note:

Jul 2, 2021 @ 09:18

Author:

Carruth, Edwin - Research Coordinator

	A	B	C	D	E	F	G	H	I
1	Accounting of Disclosures Form for Research								
2	Department Name: Research P.I. Dr. Cherry Wongtrakool - Exhale Study - ext. 4183								
3	Patient Name	Last four SS#	Date of Disclosure	Description of what was disclosed/sent	Purpose of Disclosure	Employee who disclosed info	How info was disclosed	Name of Outside Person, Title & Organization	Address and Phone# of Person or Outside Organization
4	John Smith (alias)	(2222)	2.1.12 and 3.1.12	ICF, CRFs, labs, med hx	research	Jane Guidot	electronic data entry and fax	1) NIH - Dr. Bob Lee, PI 2) ICON Lab - Betty Smith, monitor	1) NIH= 123 Baltimore MD 55022 . 444 444-6666, 2) ICON Lab 123 Oak St. St Paul, MN 55082 555 666-7777
5	Jane Doe (alias)	(1234)	1.1.12, 1.13.12, 1.15.12, and 2.31.12	study visit 1 and 2 and queries	see above	Jane Guidot	electronic data entry	see above	see above

Accounting of Disclosures

VA



U.S. Department of Veterans Affairs
Atlanta VA Health Care System



SCANNING PROCEDURES

VA Form 10-9012 – Investigational Drug Information Record
VA Form 10-0483 – Notice of Privacy Practices Acknowledgement

VA



U.S. Department of Veterans Affairs
Atlanta VA Health Care System

Unanticipated Problem in Human Subject's Research Involving Risks to Subjects or Others (UPIRTSO)





REPORTABLE EVENTS

UNANTICIPATED/UNEXPECTED

Refers to an incident, experience, or outcome in human research that is new or greater than previously known in terms of nature, severity, or frequency, given the procedures described in protocol documents and the characteristics of the study population.

RELATED TO RESEARCH

The phrase related to participation in the research” means a logical sequence of cause and effect shows that the study procedures were the reason for the incident, experience, or outcome. The phrase “possibly related to participation in the research” implies a lesser degree of certainty about causality and refers to an incident, experience, or outcome for which there is some evidence to reasonably suggest a causal relationship between study procedures and the incident, experience, or outcome.

REPORTABLE EVENTS

SERIOUS ADVERSE EVENT (SAE)

An untoward occurrence, whether or not considered related to a subject's participating in research, that results in death, a life-threatening experience, inpatient hospitalization, prolongation of hospitalization, persistent or significant disability or incapacity, congenital anomaly, or birth defect, or that requires medical, surgical, behavioral, social, or other intervention to prevent such an outcome.

SERIOUS PROBLEM (SP)

1. A problem in human research that may reasonably be regarded as:
2. Involving substantive harm, or a genuine risk of substantive harm, to the safety, rights, or welfare of human research subjects, research personnel, or others, including their rights to privacy and confidentiality of identifiable private information; or
3. Substantively compromising a facility's human research protection or human research oversight programs. (VHA Handbook 1058.01§4t)



PROTOCOL DEVIATIONS

A departure from the IRB-approved protocol. Deviations may represent minor departures and/or noncompliance.

- Report PDs to the IRB of record if there has been a substantive deviation from the protocol that could or did adversely affect at least one of the following:
 - The rights, welfare, or safety of subjects;
 - The subject's willingness to continue participation; or
 - The scientific integrity of research data
- Protocol Deviation and Noncompliance Policy is located on the AVAHCS research website.

NON-COMPLIANCE

Definition “Failure to comply with any of the regulations and policies of the IRB and/or VA and failure to follow the determinations of the IRB and R&D Committee”

- Noncompliance may be minor or sporadic, or it may be serious and/or continuing
- Noncompliance can be on the part of researchers, staff, other employees, and of the IRB

Consult the IRB or the VA Research Compliance Officer (RCO) for questions about what to report and how

REPORTABLE EVENTS

**VA
Investigators
must report to
the IRB of
Record and the
AVAHCS
Research Office
all UPIRTSOs**



This includes UNANTICIPATED
and research RELATED

1. Local Research Deaths
2. Local Serious Adverse Events (SAE)
3. Serious Problems (SP)

REPORTING TIMELINES



IMMEDIATELY (WITHIN 1 HR)

Incidents, events or problems that involve the unauthorized use, disclosure, transmission, removal, theft, loss, or destruction of **VA research-related protected health information (PHI), individually identifiable private information, or confidential information** as defined by the HIPAA Privacy Rule, the Common Rule, the Privacy Act or 38 U.S.C. must be reported **within 1 hour** as described in the AVAHCS policy entitled: **“Research Information Incidents.”** This policy can be found on the AVAHCS research website

In Addition to Reporting the Event to the IRB of Record, Email Must be Sent to VAReportableEvents@faver.foundation to Alert the AVAHCS Research Office that a Reportable Event has occurred. Include the following information:

- PI's name
- IRB number
- IRB name
- Study title
- Summary of the event

REPORTING TIMELINES



IMMEDIATELY
(1hr)

Deaths



5 BUSINESS
DAYS

IMMEDIATELY (WITHIN 1 HR)

Deaths that are Unanticipated and Related to the Research Conducted in Local VA Studies Must be Orally and Immediately (within one hour) Reported to the IRB of Record and AVAHCS Research Office, Followed by a Written Report within 1 Business Day

In Addition to Reporting the Event to the IRB of Record, Email Must be Sent to VAReportableEvents@faver.foundation to Alert the AVAHCS Research Office that a Reportable Event has occurred. Include the following information:

- PI's name
- IRB number
- IRB name
- Study title
- Summary of the event

REPORTING TIMELINES



Immediately
(1 hr)



IMMEDIATELY
(1 hr)

5 BUSINESS DAYS

Other Unanticipated and Research Related Reportable Events Must be Reported to the IRB of Record and the AVAHCS Research Office Within 5 Business Days of Learning of the Event

In Addition to Reporting the Event to the IRB of Record, Email Must be Sent to VAReportableEvents@faver.foundation to Alert the AVAHCS Research Office that a Reportable Event has occurred. Include the following information:

- PI's name
- IRB number
- IRB name
- Study title
- Summary of the event

REPORTABLE EVENT POLICIES

The “Reportable Event Policy”, the “Reportable Event Flowchart”, and Other Forms and Instructions are Located on the AVAHCS Research Website



National Cancer Institute (NCI)

<https://www.ncicirb.org/institutions/institution-quickguides/managing-study/completing-up-and-or-scrt>



Emory IRB

<http://www.irb.emory.edu/forms/reportable.html>



VA Central IRB

<https://www.research.va.gov/programs/pride/cirb/forms/119.doc>



All of Us

Report per All of Us IRB SOP 0312

REPORTABLE EVENT POLICIES

The PI may be required to submit a summary of all local reportable events at Continuing Review to the IRB of Record. If using Emory IRB, submit the “Atlanta VA Periodic Reportable Event Summary” posted on the AVAHCS research website.

The PI is also responsible for tracking any events that did not meet the reporting threshold and documenting why this event did not need to be reported within that time frame. Keep this information with the study records.

References

1. VA Research Policies and Procedures:
https://www.atlanta.va.gov/services/research/Conducting_Human_Research.asp
2. Good Clinical Practice
3. International Committee on Harmonization
4. Code of Federal Regulations Title 21
5. CoC: <https://grants.nih.gov/policy/humansubjects/coc/what-is.htm>
6. VA Records Retention Schedule January 2020
7. VHA Directive 1200.05
8. Common Rule
9. 38 CFR Part 16, Protection of Human Subjects
10. 38 CFR Part 17, Medical



U.S. Department of Veterans Affairs
Atlanta VA Health Care System